

1 **TIFFANY & BOSCO, P.A.**  
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11 TB File No. 17-73290

12 Attorneys for *Secured Creditor* JPMorgan Chase Bank, National Association

13 **UNITED STATES BANKRUPTCY COURT**

14 **DISTRICT OF NEVADA**

15 IN RE:

16 JOHNNY TARVER,

17 Debtor.

BK Case No. 19-12115-abl

Chapter 13

**LIMITED RESPONSE TO MOTION  
TO ALLOW DEBTOR TO SELL REAL  
PROPERTY LOCATED AT 1255  
KENWOOD RD., SANTA BARBARA,  
CA 93109**

18 **LIMITED RESPONSE TO MOTION TO SELL REAL PROPERTY**

19 JPMorgan Chase Bank, National Association., Secured Creditor in the above-entitled  
20 Bankruptcy proceeding, hereby submits the following the following limited response to the  
21 Debtors' Motion to Sell Real Property located at 1255 Kenwood Rd., Santa Barbara, CA  
22 93109.

23 Secured Creditor, as second lien holder, does not oppose the sale of the real property  
24 provided Secured Creditor's lien will be paid in full subject to the sale closing on within 90  
25 days from the date of the Court's Order and sale is subject to a proper payoff quote; or that  
26 any extension of the closing date or sale short of full payoff be subject to Secured Creditor's

1 final approval. Further, funds from the sale should be received by Secured Creditor within  
2 ninety (90) days from the date of the Court's order, unless otherwise agreed to by Secured  
3 Creditor.

4 DATED this 3rd day of April, 2020.

5  
6 **TIFFANY & BOSCO, P.A.**

7 By /s/ Ace C. Van Patten, Esq.  
8 ACE C. VAN PATTEN, ESQ.  
9 Attorney for Secured Creditor  
10 10100 W. Charleston Boulevard, Suite 220  
11 Las Vegas, NV 89135

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15 IN RE:

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17 Debtor.

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CERTIFICATE OF SERVICE

**CERTIFICATE OF SERVICE**

- 18 1. On this 3rd day of April, 2020, I served the following documents:

19 **LIMITED RESPONSE TO MOTION TO ALLOW DEBTOR TO SELL REAL  
20 PROPERTY LOCATED AT 1255 KENWOOD RD., SANTA BARBARA, CA  
21 93109**

- 22 2. I caused to be served the above-named document by the following means to the  
23 persons as listed below:

X a. ECF System

24 Christopher Patrick Burke  
atty@cburke.lvoxmail.com  
25 Attorney for Debtors

26 Kathleen A. Leavitt  
courtsecf3@las13.com  
Trustee

1           **X b. United States mail, postage fully prepaid:**

2                   Christopher Patrick Burke  
3                   218 S Maryland Pky.  
4                   Las Vegas, NV 89101  
5                   Attorney for Debtors

6                   Johnny Tarver  
7                   1920 Asburn Dr.  
8                   North Las Vegas, NV 89032  
9                   Debtor

10                  **I declare under penalty of perjury the foregoing is true and correct.**

11                  DATED this 3rd day of April, 2020.

12                  By: /s/ Michelle Benson